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July 20, 2018

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VIA ECF

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Hon. Lena Dunn Wettre
Magistrate Judge
U.S. District Court, District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street Room 4015
Newark, NJ 07101

Re: Trzaska v. L'Oréal USA, Inc., et ano, Civil Action No. 2:15-cv-2713-SDW-LDW

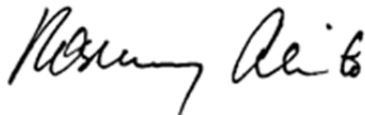
Dear Judge Wettre:

This firm represents Defendant L'Oréal USA, Inc. ("L'Oréal USA") in this matter. Pursuant to Your Honor's Amended Pretrial Scheduling Order dated April 26, 2018, we respectfully submit this status letter in advance of the telephonic status conference scheduled for July 25, 2018 at 3:30 p.m. The parties have exchanged written discovery demands and intend on responding to those demands on or before July 25, 2018.

The parties currently have an issue about deposition scheduling. On May 25, 2018, L'Oréal USA served notice of Plaintiff's deposition to be conducted on July 9, 2018. Plaintiff requested, and all parties agreed, that Plaintiff's deposition would be rescheduled for a date after responses to written discovery were served on the agreed upon date of July 25. Meanwhile, on July 18, 2018, Plaintiff issued a subpoena to take the deposition of Patricia Rocha, Esq., a former in-house patent attorney employed by L'Oréal USA, on August 14, 2018. L'Oréal USA requested that the deposition of Ms. Rocha take place after the first-noticed deposition of Plaintiff, but Plaintiff's counsel refused to agree to this request.

Thank you for Your Honor's attention to this matter.

Respectfully submitted,



Rosemary Alito

cc: Counsel of Record (*via ECF*)